

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**WOMBLE BOND DICKINSON (US) LLP**

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In re:

LTL MANAGEMENT LLC,

Debtor.<sup>1</sup>

Case No.: 23-12825 (MBK)

Chapter: 11

Hon. Michael B. Kaplan

**NOTICE OF MOTION TO SEAL THE REDACTED PORTIONS OF PROPOSED  
FINDINGS OF FACT AND CONCLUSIONS OF LAW AFTER TRIAL ON MOTIONS TO  
DISMISS CHAPTER 11 CASE SUBMITTED BY THE AD HOC COMMITTEE OF  
STATES HOLDING CONSUMER PROTECTION CLAIMS**

**PLEASE TAKE NOTICE** that the Ad Hoc Committee of States Holding Consumer Protection Claims (the “Ad Hoc Committee”), by and through its counsel, shall move on August 22, 2023 at 10:00 a.m. (ET) before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order pursuant to D.N.J. LBR 9018-1 to file under seal the redacted portions of Proposed Findings of Fact and Conclusions of Law After Trial on Motions to Dismiss Chapter 11 Case Submitted by the Ad Hoc Committee of States Holding Consumer Protection Claims (the “Motion to Seal”).

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<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

**PLEASE TAKE FURTHER NOTICE** that, the Ad Hoc Committee shall rely upon the application filed herewith in support of the Motion to Seal, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the supporting application filed with the Motion to Seal.

**PLEASE TAKE FURTHER NOTICE** that, responsive papers, if any, must be filed in accordance with the Court's order entered with respect to the Scheduling Application. If the order entered with respect to the Scheduling Application directs that written objections shall be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, a copy thereof must simultaneously be served upon the (a) Ad Hoc Committee's undersigned counsel, (b) Debtor's counsel, (c) counsel to the Official Committee of Talc Claimants, (d) the Office of the United States Trustee, and (e) any other party entitled to notice so they are received by the deadline set forth in the order entered with respect to the Scheduling Application.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely filed and served, the Motion to Seal will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: July 19, 2023

**WOMBLE BOND DICKINSON (US) LLP**

/s/ Ericka F. Johnson

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